

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA**

Friedrichs Harris, Administrator of the
Estate of Evan M. Harris, deceased,

Plaintiff,

v.

Civil Action No. 2:16-cv-46
Judge Bailey

Q & A Associates, Inc.
Angela Shockley, Individually,
Keith Bishop, Individually,
Matthew Shockley, Individually,
Sandy Schmiedeknecht, Individually, and,
Tammy Robbins, Individually,

Defendants.

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE

Now Comes Plaintiff, by and through his counsel David A. Sims and does hereby move this Honorable Court for an enlargement of time to respond to comply with the Court's Scheduling Order for the pleadings that are due on May 4, 2018. Plaintiff's counsel is in Dallas, Texas for a deposition of an expert witness in a different case. Due to weather conditions in Dallas, the gate agent informed counsel that he was not going to get back to West Virginia today, as originally scheduled due to thunderstorms, hail and other adverse weather conditions, and due to scheduling issues tomorrow, he would not likely get back to West Virginia until late Friday evening, May 4, 2018. Counsel for Plaintiff just received official notice from American Airlines that his flight has been delayed which will prevent his making his connecting flight to Charleston, West Virginia.

Plaintiff's counsel has reached out to counsel for the Defendants to see if she was agreeable to the additional time and alerted her both by email and by voicemail that she

could have the same extension of time, which would make all of the pleadings and exhibits currently due on May 4, 2018 due on May 7, 2018. At this point in time, counsel for Plaintiff has not had a reply to either the voicemail or email message.

Wherefore, Plaintiff prays that this Honorable Court will enter an Order extending the deadline until May 7, 2018.

Friedrichs Harris, Administrator

s/David A. Sims

By:

David A. Sims (#5196)
LAW OFFICES OF DAVID A. SIMS, PLLC
P.O. Box 5349
Vienna, West Virginia 26105
304-428-5291
304-428-5293 (fax)
david.sims@mywvlawyer.com

CERTIFICATE OF SERVICE

I David A. Sims as counsel for Plaintiff do hereby certify that I served PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME by CM\ECF counsel for Defendants:

Lindsey M. Saad, Esquire
FLAHERTY SENSABAUGH BONASSO, PLLC
48 Donley Street
Suite 501
Morgantown, WV 26501
lsaad@flahertylegal.com

Dated at Vienna, West Virginia on this 3rd day of May 2018.

Friedrichs Harris, Administrator
By counsel,

/s/David A. Sims

David A. Sims (W.Va. Bar No. 5196)

LAW OFFICES OF DAVID A. SIMS, PLLC
P. O. Box 5349
Vienna, West Virginia 26105

(304)-428-5291
david.sims@mywvlawyer.com